

# **EXHIBIT 3**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

**INTELLECTUAL VENTURES I LLC AND  
INTELLECTUAL VENTURES II, LLC,**

**Plaintiff,**

**vs.**

**AMERICAN AIRLINES, INC.,**

**Defendant.**

**Civil Action No. 4:24-cv-00980**

**JURY TRIAL**

**DECLARATION OF BRYAN RIFFE**

I, Bryan Riffe, hereby declare as follows under penalty of perjury:

1. My name is Bryan Riffe. I am over 21 (twenty-one) years of age and am competent to make this Declaration. I have personal knowledge of the facts set forth in this Declaration, and they are all true and correct to the best of my knowledge.

2. I am a Managing Director, Cabin and Configuration Engineering, with American Airlines, Inc. (“American”). I have been in this role for about 3 years. I have been with American for over 10 years.

3. American is a commercial passenger airline that maintains its headquarters and principal place of business at 1 Skyview Drive, Fort Worth, Texas, 76155. American’s corporate employees and decision makers principally work at its Fort Worth headquarters.

4. In my current role with American, I have responsibility for American’s aircraft-based WiFi systems. To that end, I have knowledge of the current and historical aircraft-based WiFi systems used by American. For convenience, I refer to these systems as American’s “In-

Flight WiFi Systems.”

5. American contracts with three manufacturer vendors for its In-Flight WiFi Systems: Viasat, Panasonic Avionics, and Intelsat (which I understand purchased a company called GoGo Commercial Aviation and is itself in the midst of merging with a company called SES S.A.). I understand the vendors American contracts with for its In-Flight WiFi Systems are not headquartered in Texas. I understand that Panasonic Avionics is headquartered in Irvine, CA, Viasat is headquartered in Carlsbad, CA, and Intelsat is headquartered in McLean, Virginia.

6. American does not design or manufacture the In-Flight WiFi Systems, including the equipment used in these systems, such as the satellite dishes, routers, and onboard servers. The manufacturer-vendors provide hardware, software, and services required to operate their respective In-Flight WiFi Systems and maintain their respective code and technical documentation.

7. American is a downstream user of the In-Flight WiFi Systems provided by these manufacturer vendors. American relies on the manufacturer-vendors for ongoing system service, support, updates, and resolving technical issues concerning the In-Flight WiFi Systems.

8. I hereby declare under penalty of perjury that the foregoing information is true and correct and within my personal knowledge.

  
\_\_\_\_\_  
Bryan Riffe

FEBRUARY 10, 2025  
\_\_\_\_\_  
Date

FORT WORTH, TX  
\_\_\_\_\_  
Location of Execution